

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RECYTECH USA, INC. and	)	
HAN METAL USA, INC.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
v.	)	FILE NO. 1:23-cv-05589-SEG
	)	
GRANGE INSURANCE COMPANY,	)	
	)	
Defendant.	)	
	)	

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**CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR FILE  
RESPONSIVE PLEADINGS AND TO EXTEND TIME FOR PLAINTIFF’S  
RESPONSE TO ANY MOTION FILED ON DEADLINE FOR  
RESPONSIVE PLEADINGS**

COME NOW Plaintiffs Recytech USA, Inc. and Han Metal USA, Inc. (“Plaintiffs”) and Defendant Grange Insurance Company (“Grange”), by and through their undersigned attorneys, and move the Court to extend the time for Grange to answer, file responsive pleadings or motions, or otherwise respond to Plaintiffs’ Complaint until January 22, 2024 and for Plaintiffs to respond to any motion filed by Grange on January 22, 2024 until February 22, 2024.

1.

Plaintiffs served Grange on December 19, 2023. The time for Grange to Answer or otherwise response to Plaintiffs’ Complaint is presently January 9, 2024.

2.

Plaintiffs have agreed to stipulate to extend the time for Grange to file responsive pleadings or motions or otherwise respond to Plaintiffs' Complaint until January 22, 2024.

3.

Grange anticipates that it may file a Motion with or instead of an Answer. Plaintiff and Defendants respectfully request Plaintiffs have through and including February 22, 2024 to respond to any Motion filed with or instead of an Answer.

4.

This consent motion is made in good faith, and no prejudice will result to the parties as a result of the extension.

5.

A proposed order reflecting the agreed-upon extensions of time is submitted herewith.

***[SIGNATURES ON NEXT PAGE]***

Respectfully submitted this 9<sup>th</sup> day of January, 2024.

<b>SWEETNAM SCHUSTER &amp; SCHWARTZ, LLC</b>  <u>/s/ Jared Siegel</u> <b>[with express permission by Rebecca E. Strickland]</b> Edwin Schwartz Georgia No. 631037 Jared Siegel Georgia Bar No. 113155 1050 Crown Pointe Parkway, Suite 500 Atlanta, Georgia 30338 Telephone: (470) 395-7842 Facsimile: (770) 234-6779 eschwartz@sweetnamlaw-llc.com <a href="mailto:jsiegel@sweetnamlaw.com">jsiegel@sweetnamlaw.com</a>	<b>SWIFT, CURRIE, McGHEE &amp; HIERS, LLP</b>  <u>/s/ Rebecca E. Strickland</u> Rebecca E. Strickland Georgia State Bar No. 358183 <i>Attorneys for Defendant Grange Insurance Company</i> 1420 Peachtree Street, N.E. Suite 800 Atlanta, GA 30309-3231 (404) 874-8800 <a href="mailto:rebecca.strickland@swiftcurrie.com">rebecca.strickland@swiftcurrie.com</a>
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**CERTIFICATION OF FONT**

We hereby certify that this pleading has been prepared with Times New Roman 14 point selection, as approved by the Court in L.R 5.1B.

This 9th day of January, 2024.

Respectfully submitted,

SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ Rebecca E. Strickland

Rebecca E. Strickland

Georgia State Bar No. 358183

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Company*

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day electronically filed the foregoing  
**CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER OR FILE  
RESPONSIVE PLEADINGS AND TO EXTEND TIME FOR PLAINTIFF'S  
RESPONSE TO ANY MOTION FILED ON DEADLINE FOR RESPONSIVE  
PLEADINGS** by e-filing same using the CM/ECF File & Serve System which will  
automatically send e-mail notification of said filing to the following attorneys of  
record:

Edwin Schwartz  
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*Attorney for Plaintiff*

This 9<sup>th</sup> day of January, 2024.

Respectfully submitted,

SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ Rebecca E. Strickland

Rebecca E. Strickland  
Georgia State Bar No. 358183  
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